Please Reject Disposal Injection Well Permit PAS2D702BALL

Non-responsive based on revised scope.
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To: R3 UIC Mailbo R3 UIC Mailbo @epa.gov

Please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection well , directly related to the current permit application

A condition of permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection well is “the permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water (“USDW”), if the pre ence of that contaminant may cau e a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons.” During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the “Well operator failed to notify the Department within 24 hour of receiving notification from a landowner, water purveyor, or affected per on that a water supply has been affected by pollution or diminution.” Since that file review, there have been no subsequent file reviews or inspections at this site. DEP is clearly not equipped to adequately monitor the conditions of disposal injection wells, which surely require more than a yearly inspection. The related Sedat 1A monitoring well ha not been in pected ince November 11, 2020 which will be di cu ed later in thi comment.

Additionally, immediately after receiving a disposal injection well permit from EPA and DEP, DEP issued five violations to Penneco Environmental Solutions for poor construction practices at the Sedat #3A well on Augu t 12, 2020 that could ea ily contribute to the failure of the well to contain contaminant